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**MEMO ENDORSED**

October 25, 2007

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**VIA FACSIMILE: 212-805-7906**

The Honorable Judge Denny Chin  
Daniel Patrick Moynihan U. S. Courthouse  
500 Pearl Street - Room 1020  
New York, New York 10007

RE: OCEAN LINE HOLDINGS LIMITED  
v. CHINA NATIONAL CHARTERING CORP.,  
a/k/a SINOCHART  
07 CV 8123 (DC)

Dear Judge Chin:

We represent the Plaintiff in the captioned matter which involves an attachment under Rule B. Late last Thursday, the Defendant China National Chartering filed a Motion to Vacate the Attachment on the basis that it was subject to immunity under the Foreign Sovereign Immunities Act.

Pursuant to Your Honor's Order last week, the parties had agreed on a motion schedule which provided for our opposition papers to be filed today. That schedule was the product of an agreement between counsel. Unfortunately, and owing to the fact that we are now dealing with issues relating to the status of an entity in China, and the time differences which come with dealing on the other side of the world, it has taken us longer to complete our opposition than we had originally envisioned.

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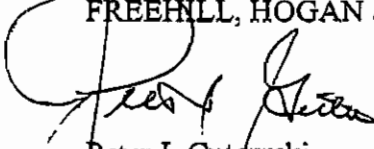
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I have spoken to counsel for the Defendant (Patrick Lennon) and he has confirmed that his client is amenable to an adjournment through next Monday, October 29. Unfortunately, and as I have expressed to Mr. Lennon, I am not sure that even that timeframe will be sufficient, and so I write to make application to the Court for leave to file our opposition papers three days later on Thursday, November 1, 2007.

In support of this position, I would note for the Court's guidance that the case involves a substantial sum of damages which resulted from the complete loss and destruction of the vessel. In addition, the Defendant had a considerably longer period within which to prepare its submission and we, of course, would have no objection if a reciprocal request was made by them when they receive our opposition. My mention of this is in no way to be construed as a dissatisfaction in any way with Defendant's counsel's efforts to comply with our request and we acknowledge and thank them for their courtesies in securing the extension through Monday. All things considered, however, and in view of the nature of the issue raised in the motion and the time constraints under which we are operating (having to deal with counsel on the other side of the world), we would ask the Court's indulgence in allowing us three further days up through November 1 within which to submit our opposition.


We appreciate the Court's attention to this request, apologize for any inconvenience this request imposes on the Court, and thank counsel for the Defendant for his courtesies in respect to the extension which presently exists through Monday.

Respectfully submitted,  
FREEHILL, HOGAN & MAHAR LLP

  
Peter J. Gutowski

PJG:mjg

cc: Via Telefax  
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Approved.  
SO ORDERED.  
  
WJS 10/26/07